Exhibit C

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1
                   UNITED STATES DISTRICT COURT
                      DISTRICT OF ARIZONA
3
 5
    IN RE BARD IVC FILTERS
 6
    PRODUCTS LIABILITY ) NO. MD-15-02641-PHX-DGC
    LITIGATION,
9
                        DO NOT DISCLOSE
             SUBJECT TO FURTHER CONFIDENTIALITY REVIEW
10
11
                     VIDEOTAPED DEPOSITION
                             - of -
12
                  CHRISTOPHER S. MORRIS, M.D.
13
14
         taken on behalf of the Plaintiffs on Tuesday,
15
         July 25, 2017, at the Courtyard by Marriott,
16
         25 Cherry Street, Burlington, Vermont,
         commencing at 9:08 AM.
17
18
19
20
            VIDEO TECHNICIAN: DEVYN MULHOLLAND
21
          COURT REPORTER: JOHANNA MASSÉ, RMR, CRR
22
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- 1 A. Yes.
- Q. Do you ever do open-surgery filter removals?
- 3 A. No.
- 4 Q. Who does -- who does those?
- 5 A. I don't think anyone has ever done one in our
- 6 hospital, but generally speaking it would be surgeons,
- 7 most -- most often probably vascular surgeons, but it
- 8 could be a trauma surgeon or a general surgeon.
- 9 Q. And you're not a surgeon --
- 10 A. No.
- 11 Q. -- is that correct?
- You're not a vascular surgeon; you're not a
- 13 trauma surgeon --
- 14 A. No.
- 15 Q. -- correct?
- Is that right?
- 17 A. That's correct. But I am professor of
- 18 surgery.
- 19 Q. But you're not a surgeon?
- 20 A. Correct.
- Q. All right. And you're not -- you don't design
- 22 medical devices, do you?
- 23 A. I'm in the process of designing a medical
- 24 device, yes.

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1
                      CERTIFICATE
 2.
 3
              I, Johanna Massé, RMR, CRR, Court Reporter and
    Notary Public, do hereby certify that the foregoing
 4
 5
    pages, numbered 7 through 365, inclusive, are a true
    and accurate transcription of my stenographic notes of
 6
 7
    the Deposition of Christopher S. Morris, M.D., who was
    first duly sworn by me, taken before me on Tuesday,
 8
    July 25, 2017, commencing at 9:08 AM, in the matter of
10
     In Re Bard IVC Filters Products Liability Litigation,
11
    Case No. MD-15-02641-PHX-DGC, as to which a transcript
12
    was duly ordered. Review of the transcript was
13
    requested.
14
             I further certify that I am neither attorney
15
    nor counsel for, nor related to or employed by any of
16
    the parties to the action in which this transcript was
    produced, and further that I am not a relative or
17
18
    employee of any attorney or counsel employed in this
19
     case, nor am I financially interested in this action.
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21
22
23
                      JOHANNA MASSÉ, RMR, CRR
24
                      Comm. expires: 2/10/19
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